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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

CLASS ACTION

This document relates to:

ALL ACTIONS

**DECLARATION OF SCOTT M. MALZAHN IN  
SUPPORT OF DEFENDANTS' RESPONSE TO  
PLAINTIFFS' MOTION TO SUBSTITUTE NEW  
LEAD PLAINTIFF**

Date: March 7, 2019

Time: 1:30 p.m.

Crtrm: 3

Judge: Hon. Richard Seeborg

Trial Date: Not yet set

1 I, Scott M. Malzahn, hereby declare:

2 1. I am a member of the State Bar of California, a partner at the law of Baker Marquart  
3 LLP, and counsel for defendants Dynamic Ledger Solutions (“DLS”), Arthur Breitman and Kathleen  
4 Breitman in this action. I have personal knowledge of the following facts and, if called to testify,  
5 could and would testify competently thereto.

6 2. On or about August 2, 2018, my office sent a preservation demand letter to Lead  
7 Plaintiff Arman Anvari’s counsel in this action, a true and correct copy of which is attached as Exhibit  
8 A.

9 3. Attached as Exhibit B is a true and correct copy of a social media post referenced in  
10 the letter attached as Exhibit A.

11 4. Attached as Exhibit C is a true and correct copy of a social media post referenced in  
12 the letter attached as Exhibit A.

13 5. Attached as Exhibit D is a true and correct copy of a social media post referenced in  
14 the letter attached as Exhibit A.

15 I declare under penalty of perjury under the laws of the United States that the forgoing is true  
16 and correct.

17 Executed this 7th day of February 2019, at Sacramento, California.

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By: /s/ Scott M. Malzahn  
Scott M. Malzahn

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